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6 *Attorneys for Defendants*
7 *Keolis Transit America and*
8 *Regional Transportation Commission of*
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9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MANUEL VERMA, an individual, DUANE
13 USHIJIMA, an individual,

14 Plaintiffs,

15 vs.

16 KEOLIS TRANSIT AMERICA, LLC;
DOES 1 through 10 inclusive; ROES
17 CORPORATIONS/ENTITIES 1 through 10
inclusive; and REGIONAL
18 TRANSPORTATION COMMISSION OF
SOUTHERN NEVADA; DOES 1 through
19 10 inclusive; ROES
CORPORATIONS/ENTITIES 1 through 10
20 inclusive,,
21 Defendants.

Case No. 2:16-cv-02037-JAD-NJK

**STIPULATION AND ORDER TO
CONTINUE HEARING ON
DEFENDANTS' MOTION TO DISMISS**

(First Request)

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23 The parties, by and through their respective counsel, hereby stipulate and agree to continue
24 the hearing on Defendants' Motion to Dismiss (ECF No. 13) currently set for December 12, 2016
25 at 2:30 pm to ~~December 29, 2016~~, or thereafter as the Court's calendar permits. *

26 The parties further stipulate and agree that Defendants shall have to and including December
27 5, 2016 within which to file a Reply in Support of its Motion to Dismiss.
28

1 This request is prompted by defense counsel's scheduling conflict. Defense counsel needs
2 additional time to review the Plaintiff's opposition to its motion because of counsel's involvement
3 in two representation cases filed with the National Labor Relations Board in the past two weeks.

4 It is necessary to continue the oral argument because Defense counsel will be handling an
5 unfair labor practice trial before the National Labor Relations Board in the matter entitled *Jose*
6 *Escoto and Stratosphere Gaming, LLC* which is expected to take two days.

7 This stipulation and order is sought in good faith and not for the purpose of delay.

8 DATED: November 18, 2016.

9 THE THATER LAW GROUP, P.C.

JACKSON LEWIS P.C.

10
11 /s/ M. Lani Esteban-Trinidad
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Attorney for Defendants
Keolis Transit America, LLC and
Regional Transportation Commission of
Southern Nevada

17 **ORDER**

18 IT IS SO ORDERED.

19
20 
21 U.S. District/Magistrate Judge

DATED: 11/21/2016

22 *IT IS ORDERED that the motion hearing RE [13] Motion to Dismiss is RESET for
23 1/4/2017 at 2:00 PM.